



May 12, 2023

Via Email

Barbara Neal
Executive Director
Vermont Enhanced 911 Board
6 Baldwin Street
2nd Floor
Montpelier, VT 05633-7960

Re: Vermont Enhanced 911 Board / Rule Governing Outage Reporting Requirements for
Originating Carriers and Electric Power Companies

Dear Ms. Neal:

Comcast and Charter respectfully submit this letter with brief comments on the Vermont E911 Board's proposed amendments to the referenced rule dated March 3, 2023.

Comcast and Charter support the proposed amendment to §4.3 requiring Originating Carriers to submit a second notification only when there is a change in impacted subscribers or impacted area or at the request of the Board. To avoid having to submit non-material second notifications, Comcast and Charter recommend the following language at the end of §4.3: "a second notification will be provided when there is a change in the impacted area or more than a ten percent increase in the number of impacted subscribers, or at the request of the Board."

Comcast and Charter continue to recommend that the Board include language in §6.1 indicating the Board will offer Originating Carriers and Electric Companies a reasonable opportunity to provide input on changes to the format of reports. Currently, Comcast and Charter's outage reports are automatically generated. It is important that changes in the format of reports do not prevent automatically generated reporting or require new categories of information not already being reported.

Comcast and Charter support the addition of proposed §8.2 that provides updates to the rule are effective when Originating Carriers are technically capable of complying but no later than six months after adoption of the final amended rule.

Comcast and Charter appreciate the Board's consideration of these comments. Please feel free to contact us with any questions.

Respectfully submitted,

COMCAST

A handwritten signature in black ink, appearing to read 'JG White'.

James G. White, Jr.
Senior Director Regulatory Affairs
james_white3@cable.comcast.com
617-279-5593

CHARTER

A handwritten signature in black ink, appearing to read 'Michael A. Chowaniec'.

Michael A. Chowaniec
Vice President, State Government Affairs
Charter Communications
Michael.chowaniec@charter.com
203-705-5551